

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

NATIONAL FEDERATION OF THE  
BLIND, ON BEHALF OF ITS MEMBERS  
AND ITSELF, AND HEIDI VIENS,  
Plaintiffs,

v.

SCRIBD, INC.,  
Defendant.

Docket No. 2:14-cv-00162-wks

**STIPULATED DISCOVERY SCHEDULE/ORDER**

The parties submit the following Discovery Schedule pursuant to Local Rule 26(a)(3):<sup>1</sup>

1. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before May 28, 2015.

2. The parties shall serve all interrogatories and requests for production on or before July 10, 2015.

3. Depositions of all non-expert witnesses shall be completed by August 14, 2015.

4. Plaintiff shall submit expert witness reports on or before September 4, 2015.

Depositions of plaintiff's expert witnesses shall be completed by October 30, 2015.

5. Defendant shall submit expert witness reports on or before September 25, 2015.

Depositions of defendant's expert witnesses shall be completed by October 30, 2015.

6. The Early Neutral Evaluation session shall be conducted on November 17, 2015 at 10:00 a.m. The parties have agreed that Richard T. Cassidy, Esq. will serve as the early

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<sup>1</sup> Defendant Scribd, Inc. stipulates to the following schedule in the event that the Court denies the pending Motion for Certification of Order for Interlocutory Review Pursuant to 28 U.S.C. Section 1292(B) and to Stay Action Pending Further Appellate Proceedings (ECF No. 37).

neutral evaluator. (**Note: Paragraph 6 only applies to ENE-eligible cases pursuant to Local Rule No. 16.1.**)

7. The parties shall serve all requests for admission on or before October 30, 2015.
8. All discovery shall be completed by December 2, 2015 (no later than 8 months after filing of the Answer or Third-Party Answer).
9. Motions for joinder of parties and amendments to the pleadings shall be filed on or before August 1, 2015.
10. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before January 15, 2016.
11. This case shall be ready for trial by May 1, 2016.

Dated: May 21, 2015

Respectfully submitted,

/s/ Daniel F. Goldstein  
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Attorneys for Defendant

**APPROVED and SO ORDERED:**

/s/ William K. Sessions III  
U.S. District Judge

Date: May 28, 2015